

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE GRAND JURY SUBPOENA DATED
FEBRUARY 2, 2023**

Case No: _____

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO INTERVENE AND QUASH GRAND JURY SUBPOENA
DATED FEBRUARY 2, 2023**

PLEASE TAKE NOTICE that, pursuant to Rules 6 and 17 of the Federal Rules of Criminal Procedure, upon the accompanying Memorandum of Law in Support of Movants' Motion to Intervene and Quash Grand Jury Subpoena Dated February 2, 2023 (the "Motion"), the exhibits thereto, and the Declaration of Mark Califano, Movants respectfully move this Court, the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at a date and time to be determined by the Court, for an Order quashing the subpoena, dated February 2, 2023, issued by a federal grand jury sitting in the Southern District of New York. The Memorandum of Law in Support, supporting declaration and exhibits, and a proposed order are forthcoming and will be filed under seal or *in camera*, upon the assignment of a presiding judge. Movants respectfully request oral argument for the Motion.

Date: March 29, 2023

Respectfully submitted,

DENTONS US LLP

/s/Mark Califano

Mark Califano (Bar No. 5644083)

Douglas W. Henkin (Bar No. DH-1751)

Melissa Gomez Nelson (*pro hac vice* forthcoming)

Matthew A. Lafferman (*pro hac vice* forthcoming)

1900 K Street N.W.

Washington, DC 20006

Tel: (202) 496-7500

Fax: (202) 496-7756

mark.califano@dentons.com

douglas.henkin@dentons.com

melissa.gomeznelson@dentons.com

matthew.lafferman@dentons.com

Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that the forgoing Notice was served on the following Assistant United States Attorneys for United States District Court for the Southern District of New York via e-mail, pursuant to the parties' agreement, on March 29, 2023:

Andrew Thomas
Jared Lenow
Andrew.Thomas2@usdoj.gov
Jared.Lenow@usdoj.gov

/s/Mark Califano
Mark Califano